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FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Revision of the Commission's Rules) CC Docket No. 94-102
to Ensure Compatibility with) RM-8143
Enhanced 911 Emergency Calling Systems)

REPLY COMMENTS OF SPRINT CELLULAR

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I. INTRODUCTION

Sprint Cellular Company ("Sprint") respectfully replies to comments to the Commission's Notice of Proposed Rulemaking ("NPRM"), specifically on the issue of compatibility between wireless services and enhanced 911 ("E911") systems.¹

Sprint wholeheartedly supports the Commission's goal of improving the compatibility of wireless services and E911 systems, as is evidenced by its active participation in the TIA's Joint Experts Meeting ("JEM"), where consensus was reached between the public safety community and the wireless industry on an evolutionary path to compatibility.² Moreover, Sprint accepts 911 calls in every one of its cells and routes these calls to the nearest appropriate PSAP.

1. Notice of Proposed Rule Making ("NPRM"), Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, RM-8143, Released October 19, 1994, FCC 94-237.
2. Several commenters referenced the JEM Report, which was filed with the Commission and made a part of the record in this proceeding on October 26, 1994.

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Sprint applauds the Commission for initiating this proceeding in an effort to expedite fuller deployment of E911 capabilities. The NPRM has elicited a variety of positive suggestions, which will be helpful in addressing the many challenges to making effective 911 communications a reality in the wireless environment. On the other hand, an overwhelming number of commenters -- both wireless service providers and manufacturers -- urge the Commission to exercise caution in mandating firm implementation deadlines, as the NPRM has tentatively proposed for callback/re-ring, call priority, ALI and other capabilities. Sprint shares the sentiments of these commenters and urges the Commission, in the words of Commissioner Chong, to "think outside of the box"³ in its stewardship of E911, so that a solution feasible for the telecommunications industry that meets the needs of the public safety community, will be forthcoming in as timely a fashion as practical.

II. DISCUSSION

A. Wireless Systems Present Unique Challenges To E911 Delivery.

Several commenters address the pitfalls of attempting to adapt wireline protocols in a wireless environment. As CTIA states, "Both basic and E911 systems were designed to provide access to emergency services for wireline subscribers [and] do

3. Address of FCC Commissioner Rachelle Chong before the Federal Communications Bar Association, January 19, 1995.

not address the unique characteristics of wireless communication and the special issues raised by its interface with 911 services." (CTIA Comments at 3). The most important characteristic of wireless services is that they "free users from the geographic constraints of wireline telecommunications services".⁴ As Ameritech observes, it is this very characteristic that removes from the E911 equation the physical location which is the basis for emergency response. (Ameritech Comments at 6).

Also to be considered are the incidence of multiple calls reporting a single emergency, probable different locations for the caller and person needing assistance, and the special characteristics of RF propagation, which not only have no respect for jurisdictional boundaries but also dictate technological solutions that differ markedly from landline systems. (See Bell Atlantic Comments at 8-9, NYNEX Comments at 8-9). Additionally, CTIA observes that the coordinated history and evolution of landline 911 systems has been absent for wireless services. This has resulted in a situation where multiple PSAPs are forced to coordinate with multiple wireless service providers, and the problem will only expand with the licensing of PCS services. (CTIA Comments at 4).

4. Notice of Inquiry. Gen Docket No. 90-314, 5 FCC RCD 3995 (1990), para. 2.

B. The Commission Should Reconsider Its Proposed Mandates.

Sprint agrees with the many commenters who assert that the Commission's proposed deadlines for implementation of E911 capabilities are at best premature and at worst costly and counterproductive for all parties involved. Sprint is especially concerned with the proposed implementation deadlines for call priority, rerouting/callback and the three stages of ALI capabilities. A panoply of commenters express strong reservations on the soundness of the proposed mandates and on the industry's ability to meet them. Sprint does not believe it is necessary to restate these reservations; however, it makes this observation: The reservations are grounded in the problems and complexities inherent in wireless communications as detailed above, and arise from the fact that industry, although working diligently, has so far succeeded only in reaching consensus on a path to compatibility, and still has a long road to travel before reaching its ultimate destination.

Sprint therefore urges the Commission to redirect its focus. The NPRM, while a commendable initiative, is too limited in focus; the problem needs to be addressed from a broader perspective. Specifically, the Commission should take a leadership role by bringing all affected parties together to craft a solution as expeditiously as possible. Although we believe that the mandated milestone approach ought to be avoided, we nevertheless think it reasonable for the Commission to set a

date certain for completion of the task, to ensure the industry and its suppliers maintain the highest level of commitment to resolving the problem.

C. As A First Step, The Commission Should Appoint An Industry Advisory Committee.

CTIA, BellSouth and Alltel all have suggested that the task of developing wireless/E911 compatibility protocols be undertaken by a broad-based grouping of all parties. Sprint urges the Commission to appoint such an industry advisory committee, consisting of manufacturers, vendors, the emergency services community, and wireless and wireline service providers, charged with the task of reaching a compatibility solution or solutions that accommodate the requirements of all the parties, to ensure the eventual broad availability of wireless E911 on both an economically and technically sound basis, and to address concomitant policy issues.

Sprint believes that the committee should eschew firm interim deadlines, in favor of "an evolutionary approach that assures close coordination among wireless and wireline operators and emergency service agencies, while coordinating research relevant to the different methods of providing accurate location information." (APC at 2).

Sprint believes that the Commission, in addition to appointing the committee and setting its direction, should also monitor its progress and require it to submit periodic status reports. The Commission may or may not choose to appoint members of its staff to the advisory committee.

D. The Advisory Committee Should Incorporate The Work That Has Already Been Accomplished and Work Closely With Industry-Led Committees and Standards Bodies.

Commendable progress has already been made toward the goal of compatibility. Mention has been made above of the JEM Report. In addition, PCIA, APCO, NENA and NASNA have developed a position paper to facilitate the development of standards for implementation of E911 capabilities. The advisory committee should use these resources as a point of departure.

In its comments PCIA asserts that the JEM Report goes a long way toward establishing the first of four steps it postulates for developing the technical capabilities to support compatibility. Sprint endorses these four steps as sound principles that provide excellent guidelines for the advisory committee to follow. They include:

- o the drafting of a Standards Requirements Document ("SRD"), which will define the capabilities required of the wireless system, the landline telephone network and the PSAP;
- o translation of these performance requirements into hardware design and data transfer standards that will permit wireless, wireline and PSAP systems to transmit, receive and share the relevant information;
- o manufacture of prototype equipment, which must be field tested, then standards set; and
- o commercial deployment of equipment. (PCIA Comments at 3-4).

In addition to building on the work that industry has begun, and proceeding along the path laid out by PCIA, Sprint believes that the advisory committee should continue to work closely with industry groups and standards-setting bodies. This will ensure utilization of all possible expertise in the crafting of solutions that are efficient, cost-effective and practical for all affected parties.

E. E911 Capabilities Should Be Deployed To Meet The Needs Of Public Safety Organizations.

Once these solutions are in place the question of scope of deployment must be addressed. Although the Commission suggests that E911 capabilities should be universally available, Sprint strongly agrees with the several commenters who state that E911 capabilities should be made available to those public safety organizations that can use them.

In its comments CTIA states that 911 and E911 services are at this time still unavailable in 65 percent of the geographic area comprising the United States and to 25 percent of its population. (CTIA Comments at 16). Under these circumstances, requiring universal deployment of E911 technologies would waste wireless providers' resources. Instead, as CTIA, US West and SBC recommend, any Commission mandate for provision of E911 capabilities should be premised on a bona fide request by a PSAP capable of processing the information provided. This approach allows resources to be conserved and directed where they are needed and can be utilized.

Further, Sprint endorses US West's proposal to tie the request to the agreement of all affected parties on both needs definition and solution directions, in addition to the assurance of PSAP upgrade funding and other safeguards. (US West at 21-25).

F. If The Commission Promulgates Rules They Should Apply Evenly To All CMRS Providers.

Several commenters opine that, consistent with congressional intent in, and Commission rules promulgated in response to, the Omnibus Budget Reconciliation Act of 1993, requirements for 911 or E911 access imposed on existing wireless providers should be extended to all CMRS providers of voice services. (See NYNEX Comments at 10, Ameritech Comments at 8). Sprint agrees. Furthermore, Sprint believes that the continued progress of wireless competition is contingent on competitive equity.

III. CONCLUSION

Sprint is committed to working with other industry members, the public safety community and the Commission toward our common goal of extending the benefits of E911 services to wireless customers.

In recognition of the challenges and complexities of the wireless environment, Sprint urges the Commission to reconsider its proposed requirements for industry implementation of E911 capabilities. The Commission's resources would be better directed toward spearheading a more all-encompassing solution -- by first appointing an industry advisory committee composed of

all affected parties, and charging them with the task of addressing all necessary technical and policy issues, in conjunction with industry and standards setting bodies, to devise a solution by a date certain that will provide a uniform E911 platform.

Sprint believes that, when E911 capabilities exist, they should be made available to PSAPs who request and can use them.

Finally, Sprint agrees that the intent of both the Omnibus Budget Reconciliation Act of 1993 and the Commission's regulatory parity implementation rules mandates that any 911 and E911 regulations enacted be imposed on all CMRS providers of voice services.

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March 17, 1995

CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 17th day of March, 1995, sent via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Reply Comments of Sprint Cellular" in the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102 filed this date with the Acting Secretary, Federal Communications Commission, to the persons on the attached service list.


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